

Attorneys At Law

Federal ID No: 38-1422647

NATALIE LUTZ CARDIELLO, CHAPTER 7 TRUSTEE
BANKRUPTCY TRUSTEE
107 HURON DR
CARNEGIE PA 15106

Please mail remittance to:

150 Ottawa Ave, N.W.
Suite 1500
Grand Rapids, MI 49503

INVOICE FOR LEGAL SERVICES

Remittance Summary --- Please return this page with your payment

Invoice Date:	May 17, 2023	<u>Invoice Summary</u>	
Invoice Number:	2338691		
Billing Attorney:	S. M. Watson	Professional Services	\$ 35,432.50
Client/Matter Num:	208787.208787	Costs and Charges	0.00
Client Name:	CARDIELLO, NATALIE LUTZ	Total Invoice	<u>\$35,432.50</u>
Matter Name:	LOCKHART CHEMICAL COMPANY		

Make checks payable and remit to:

Warner Norcross + Judd LLP
150 Ottawa Ave, N.W.
Suite 1500
Grand Rapids, Michigan 49503

Accounting Contact:

(616) 752-2050

Email: accountsreceivable@wnj.comRemittance Advice: achremittance@wnj.com**Wire Payments (U.S. Dollars Only):**

Fifth Third Bank
38 Fountain Square Plaza
Cincinnati, Ohio 45202
ABA: 042000314
SWIFT Address: FTBCUS3CXXX
Account Number: 2079071
Beneficiary Account: Warner Norcross + Judd LLP

ACH Payments (U.S. Dollars Only):

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ABA: 072400052
Account Number: 2079071

EXHIBITB

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Fees for professional services through April 30, 2023

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Rate (\$)</u>	<u>Fee (\$)</u>
10/08/22	J. V. Byl Emails to and from R. Burns regarding discharge to City and related issues	0.20	640.00	128.00
10/10/22	J. V. Byl Review and respond to email from EGLE relating to waste characterization issues	0.10	640.00	64.00
10/10/22	J. V. Byl Emails to and from S. Watson	0.20	640.00	128.00
10/10/22	J. V. Byl Review correspondence from P. Cordaro regarding impact of bankruptcy filing	0.10	640.00	64.00
10/11/22	J. V. Byl Emails to and from S. Watson regarding same	0.10	640.00	64.00
10/11/22	J. V. Byl Review correspondence from Attorney General's office	0.10	640.00	64.00
11/11/22	B. P. Lennon Telephone conferences with J. Byl regarding bankruptcy and potential impact on investigation	0.30	575.00	172.50
11/28/22	J. V. Byl Review draft EPA order	0.50	640.00	320.00
11/28/22	S. M. Watson Review draft EPA order	0.50	520.00	260.00

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11/28/22	J. V. Byl	0.20	640.00	128.00
	Telephone conference with N. Cardiello after meeting with attorneys			
11/28/22	J. V. Byl	0.40	640.00	256.00
	Video conference with client, D. Fuchs, and EPA attorneys and DOJ regarding draft order			
11/28/22	J. V. Byl	0.50	640.00	320.00
	Video conference with N. Cardiello and D. Fuchs regarding strategy on negotiations with EPA			
11/28/22	J. V. Byl	0.10	640.00	64.00
	Several emails to and from client and R. Burns regarding issues under draft order			
11/28/22	J. V. Byl	0.10	640.00	64.00
	Telephone conference with M. Indrisano of DOJ's office regarding possible video conference to discuss draft order			
11/28/22	J. V. Byl	0.50	640.00	320.00
	Telephone conference with N. Cardiello regarding same and next steps			
11/28/22	J. V. Byl	1.00	640.00	640.00
	Video conference with client, consultant, EPA, Department of Justice, and Attorney General's office regarding status on environmental issues at facility and draft order			
11/28/22	J. V. Byl	0.20	640.00	128.00
	Several emails regarding same			
11/28/22	S. M. Watson	0.20	520.00	104.00
	Correspondence regarding same			
11/28/22	S. M. Watson	0.20	520.00	104.00
	Analyze potential strategy options related to interplay of bankruptcy court stay authority and legal effect of EPA orders under the Clean Water Act			
11/29/22	J. V. Byl	0.20	640.00	128.00
	Review and revise letter to DOJ/EPA			
11/29/22	J. V. Byl	0.10	640.00	64.00
	Review order			
11/30/22	J. V. Byl	0.10	640.00	64.00
	Review and respond to emails from R. Burns			
12/02/22	J. V. Byl	0.20	640.00	128.00
	Review correspondence from EPA regarding Order			
12/03/22	J. V. Byl	0.30	640.00	192.00
	Emails regarding order and related issues			

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12/12/22	J. V. Byl Review EPA order	0.30	640.00	192.00
12/12/22	J. V. Byl Telephone conference with N. Cardiello, D. Fuchs, and R. Burns regarding strategy on EPA order	0.90	640.00	576.00
12/14/22	P. H. Beach Analyze pre-enforcement review and related obstacles to challenging EPA order	4.20	355.00	1,491.00
12/14/22	J. V. Byl Telephone conference with N. Cardiello regarding status and strategy on negotiations with EGLE and EPA	0.40	640.00	256.00
12/14/22	P. H. Beach Telephone conference with S. Watson regarding EPA enforcement action and preliminary strategy	0.50	355.00	177.50
12/15/22	P. H. Beach Review pre-enforcement review case law	0.50	355.00	177.50
12/15/22	P. H. Beach Email correspondence with S. Watson related to challenge to EPA order	0.30	355.00	106.50
12/22/22	J. V. Byl Emails regarding same to and from S. Watson	0.10	640.00	64.00
12/22/22	J. V. Byl Review documents from Michigan Attorney General's office	0.10	640.00	64.00
12/22/22	S. M. Watson Correspondence regarding same	0.10	520.00	52.00
12/22/22	J. V. Byl Telephone conference with N. Cardiello regarding status of issues with EGLE and EPA	0.10	640.00	64.00
12/22/22	S. M. Watson Review EGLE violation notices	0.30	520.00	156.00
12/23/22	J. V. Byl Review correspondence and other documents from EGLE	0.10	640.00	64.00
12/23/22	S. M. Watson Review response to EGLE order	0.60	520.00	312.00
12/23/22	J. V. Byl Telephone conference with S. Watson regarding Violation Notices and next steps	0.40	640.00	256.00
12/23/22	J. V. Byl Email to N. Cardiello regarding next steps	0.10	640.00	64.00

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12/23/22	S. M. Watson	0.40	520.00	208.00
	Telephone conference regarding violation notices and preliminary strategy options for responding to same			
12/26/22	S. M. Watson	0.20	520.00	104.00
	Correspondence regarding violation notices			
12/27/22	J. V. Byl	0.50	640.00	320.00
	Telephone conference with N. Cardiello, J. Tibbetts, and S. Watson regarding strategy on environmental issues and next steps			
12/27/22	S. M. Watson	0.50	520.00	260.00
	Review violation notices and related materials			
12/27/22	J. V. Byl	0.50	640.00	320.00
	Review Violation Notices			
12/27/22	S. M. Watson	0.50	520.00	260.00
	Prepare for and participate in telephone conference regarding response to violation notice			
12/29/22	S. M. Watson	0.50	520.00	260.00
	Correspondence regarding same			
12/29/22	J. V. Byl	0.20	640.00	128.00
	Emails to and from S. Watson regarding communication with Attorney General's office and next steps			
12/29/22	S. M. Watson	1.00	520.00	520.00
	Telephone conference with M. Miller regarding response to violation notice			
01/04/23	S. M. Watson	0.20	550.00	110.00
	Correspondence regarding media inquiry and EGLE request			
01/05/23	J. V. Byl	0.10	670.00	67.00
	Review and respond to email from S. Watson			
01/06/23	J. V. Byl	0.20	670.00	134.00
	Telephone conference with S. Watson regarding communication with Attorney General's office and next steps			
01/06/23	J. V. Byl	0.10	670.00	67.00
	Review email from Attorney General's office			
01/09/23	J. V. Byl	0.10	670.00	67.00
	Emails to and from M. Indrisano regarding response to requests			
01/09/23	J. V. Byl	0.10	670.00	67.00
	Review forms from Attorney General's office			

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01/11/23	S. M. Watson	1.00	550.00	550.00
	Prepare for and participate in check-in call with EGLE and EPA			
01/11/23	S. M. Watson	0.50	550.00	275.00
	Correspondence summarizing same			
01/13/23	S. M. Watson	0.20	550.00	110.00
	Debrief regarding same			
01/13/23	S. M. Watson	0.80	550.00	440.00
	Prepare for and participate in check-in call with EGLE and EPA			
01/18/23	S. M. Watson	0.30	550.00	165.00
	Telephone conference regarding insurance requirements			
01/18/23	S. M. Watson	0.20	550.00	110.00
	Correspondence regarding same			
01/18/23	S. M. Watson	0.50	550.00	275.00
	Analyze potential pollution liability insurance requirements applicable to Lockhart operations			
01/19/23	S. M. Watson	0.30	550.00	165.00
	Review and prepare comments to draft work plan			
01/19/23	S. M. Watson	0.80	550.00	440.00
	Prepare for and participate in weekly call with EPA and EGLE			
01/20/23	S. M. Watson	0.60	550.00	330.00
	Review and prepare comments to draft work plan			
01/20/23	S. M. Watson	0.40	550.00	220.00
	Telephone conferences regarding same			
01/26/23	S. M. Watson	1.00	550.00	550.00
	Prepare for and participate in weekly call with EGLE and EPA			
02/02/23	S. M. Watson	1.50	550.00	825.00
	Prepare for and participate in weekly call with EGLE and EPA			
02/07/23	S. M. Watson	0.90	550.00	495.00
	Telephone conference regarding EPA and EGLE comments to draft work plan			
02/07/23	S. M. Watson	0.30	550.00	165.00
	Correspondence regarding same			
02/09/23	S. M. Watson	5.30	550.00	2,915.00
	Review and prepare substantial revisions to draft work plan			

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02/10/23	S. M. Watson Revise draft work plan	3.00	550.00	1,650.00
02/13/23	J. V. Byl Review revisions to work plan	0.10	670.00	67.00
02/13/23	J. V. Byl Telephone conference with S. Watson regarding same and strategy on next steps	0.10	670.00	67.00
02/16/23	S. M. Watson Prepare for and participate in weekly call with EPA and EGLE	0.70	550.00	385.00
02/20/23	S. M. Watson Review draft health and safety plan and materials from EGLE related to annual MAERS reporting	0.50	550.00	275.00
02/22/23	S. M. Watson Telephone conference with Trustee regarding ongoing EGLE enforcement efforts and status of EPA health and safety plan	0.20	550.00	110.00
02/23/23	S. M. Watson Weekly call with EGLE and EPA	0.80	550.00	440.00
02/28/23	J. E. Collins Email S. Watson to discuss creating compliance table for client	0.10	295.00	29.50
03/01/23	S. M. Watson Conference with J. Collins providing background for preparation of table tracking implementation of obligations under various environmental compliance orders	0.60	550.00	330.00
03/01/23	J. E. Collins Conference with S. Watson to discuss drafting a compliance table for the EPA 311 order and EGLE director letter	0.90	295.00	265.50
03/02/23	J. V. Byl Review EPA correspondence and revisions to work plan	0.10	670.00	67.00
03/02/23	J. V. Byl Telephone conference with S. Watson regarding EPA correspondence and revisions to work plan and access agreement with EPA	0.10	670.00	67.00
03/02/23	J. E. Collins Review 311 order and letter from EGLE director forwarded by S. Watson and review client consent for EPA Access to Property and Work Plan	1.10	295.00	324.50
03/02/23	S. M. Watson Attend weekly call with EPA and EGLE	0.60	550.00	330.00

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03/02/23	S. M. Watson	0.20	550.00	110.00
	Telephone conference with M. Indrisano regarding work plan and related issues			
03/02/23	S. M. Watson	0.30	550.00	165.00
	Prepare correspondence summarizing weekly call and related status items			
03/03/23	J. E. Collins	0.80	295.00	236.00
	Review 311 order issued by EPA and prepare for meeting with S. Watson			
03/03/23	J. E. Collins	0.30	295.00	88.50
	Attend meeting with S. Watson to discuss client consent for EPA access to property			
03/07/23	J. E. Collins	3.40	295.00	1,003.00
	Draft compliance table			
03/08/23	J. E. Collins	5.00	295.00	1,475.00
	Draft compliance table			
03/08/23	S. M. Watson	0.60	550.00	330.00
	Correspondence regarding EPA approval of work plan and next steps			
03/09/23	J. E. Collins	1.10	295.00	324.50
	Attend weekly status-update meeting with EPA and EGLE			
03/09/23	J. E. Collins	0.50	295.00	147.50
	Debrief with S. Watson regarding weekly EPA/EGLE phone conference meeting			
03/09/23	S. M. Watson	0.30	550.00	165.00
	Telephone conference with Trustee in preparation for call with EPA and EGLE			
03/16/23	S. M. Watson	0.20	550.00	110.00
	Correspondence with M. Miller and M. Indrisano regarding coordination of compliance efforts under EPA and EGLE orders			
03/16/23	J. E. Collins	1.50	295.00	442.50
	Analyze final work plan and draft compliance table to determine feasibility of distilling them into a compliance-tracking checklist			
03/16/23	J. E. Collins	1.10	295.00	324.50
	Attend weekly status-update meeting with EPA and EGLE			
03/16/23	J. E. Collins	1.00	295.00	295.00
	Debrief with S. Watson regarding the weekly status update meeting with EPA and EGLE			
03/17/23	J. E. Collins	0.70	295.00	206.50
	Research potential availability of consolidated order on consent to supersede outstanding orders and violation notices			

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03/21/23	J. E. Collins	1.10	295.00	324.50
	Research authority of EPA to issue administrative orders on consent under Section 311 of the Clean Water Act			
03/23/23	S. M. Watson	0.50	550.00	275.00
	Participate in weekly call with EPA and EGLE			
03/23/23	S. M. Watson	0.30	550.00	165.00
	Telephone conference with M. Indrisano regarding potential order on consent or other options to consolidate compliance obligations			
03/23/23	S. M. Watson	1.50	550.00	825.00
	Participate in telephone conference with Z-Technologies, EPA, and EGLE			
03/30/23	J. E. Collins	0.80	295.00	236.00
	Attend weekly EPA/EGLE compliance meeting			
03/30/23	J. E. Collins	0.60	295.00	177.00
	Conference with S. Watson to debrief weekly EPA/EGLE meeting and discuss next steps			
03/30/23	S. M. Watson	0.50	550.00	275.00
	Telephone conference regarding potential air impacts and other issues related to proposed use of oxidizer			
04/03/23	J. E. Collins	0.70	295.00	206.50
	Follow up on weekly call concerns regarding Flint Watershed Coalition comments			
04/04/23	J. E. Collins	0.40	295.00	118.00
	Follow up on EGLE requests based on meetings with "Flint Crisis Committee"			
04/05/23	J. E. Collins	1.10	295.00	324.50
	Compile research on Flint Watershed Coalition and "Flint Crisis Committee"			
04/06/23	J. E. Collins	0.40	295.00	118.00
	Discuss upcoming EGLE/EPA meeting with S. Watson			
04/06/23	J. E. Collins	1.10	295.00	324.50
	Attend weekly compliance meeting with EPA/EGLE			
04/06/23	J. E. Collins	0.20	295.00	59.00
	Conference with S. Watson regarding content of weekly EPA/EGLE Compliance meeting			
04/11/23	K. A. Kissling	0.50	570.00	285.00
	Conference with S. Watson regarding air compliance considerations for EPA and EGLE			
04/11/23	S. M. Watson	1.10	550.00	605.00
	Review 114 response and related correspondence from NTH in preparation for telephone conference regarding proposed restart of oxidation unit			

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04/11/23	S. M. Watson	1.00	550.00	550.00
	Telephone conference regarding strategy and potential obstacles and path forward to restart of oxidation unit			
04/13/23	J. E. Collins	0.90	295.00	265.50
	Attend weekly EPA/EGLE compliance meeting			
04/13/23	J. E. Collins	0.30	295.00	88.50
	Conference with S. Watson to debrief weekly compliance meeting			
04/20/23	S. M. Watson	0.20	550.00	110.00
	Telephone conference with K. Okonta regarding air monitoring requirements for potential use of oxidizer			
04/20/23	J. E. Collins	0.70	295.00	206.50
	Attend weekly EPA/EGLE compliance meeting			
04/20/23	J. E. Collins	0.30	295.00	88.50
	Conference with S. Watson to debrief weekly compliance meeting			
04/20/23	K. A. Kissling	0.50	570.00	285.00
	Analysis of NTH memo regarding operations and air compliance			
04/20/23	S. M. Watson	0.20	550.00	110.00
	Correspondence to N. Cardiello regarding NTH proposal and recommendation			
04/20/23	S. M. Watson	0.20	550.00	110.00
	Telephone conference with K. Kissling regarding NTH proposal for air monitoring associated with potential use of oxidizer			
04/20/23	S. M. Watson	0.10	550.00	55.00
	Correspondence to N. Cardiello regarding compliance chart and compliance items associated with potential use of oxidizer			
04/20/23	S. M. Watson	0.30	550.00	165.00
	Review and revise chart tracking compliance with EPA and EGLE orders			
04/20/23	S. M. Watson	0.20	550.00	110.00
	Prepare for weekly call with EPA and EGLE			
04/27/23	J. E. Collins	0.60	295.00	177.00
	Attend weekly compliance meeting with EGLE/EPA			

Total Fees for Professional Services**\$35,432.50**

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Costs and disbursements posted to your account after the date of this invoice will appear on a future invoice or will be separately invoiced.

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